

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CURTIS LEROY CAMPBELL,	)	
Petitioner,	)	
v.	)	Civil No. 04-0314
	)	Criminal No. 00-1
UNITED STATES OF AMERICA,	)	
Respondent	)	
	)	

**Reply to Government's Response To Motion to Reduce Sentence**  
**Based on the Amendment to the United States Sentencing Guidelines**

AND NOW comes Curtis Leroy Campbell, by and through counsel Federal Public Defender Lisa B. Freeland, and respectfully files this reply to the government's response. IN support thereof, counsel states:

1. In its response, the government agrees that a reduction in sentence is warranted in this case and correctly notes that the new advisory guideline sentencing range is 108-135 months based on an offense level of 30 and a criminal history category of II.

2. Although under different circumstances, Mr. Campbell might argue for a sentence at the low end of new guideline range, he consents to a reduction down to 120 months which, as the government notes, is the mandatory minimum sentence under 21 U.S.C. § 841(b)(1)(A). With a sentence of 120 months, Mr. Campbell will be eligible for immediate release to a halfway house and, depending on the calculation of good time credit, may be eligible for immediate release. As a result, counsel will forgo any potential arguments for a lesser sentence so that Mr. Campbell's release from incarceration will not be further delayed.

3. In counsel's opinion, there is no need for a hearing in this case unless the Court has concerns about the sentence proposed by the government and agreed to by Mr. Campbell. If there are no such concerns, counsel respectfully requests that the Court enter an order reducing Mr. Campbell's sentence to 120 months and transmit an amended judgement to the Bureau of Prisons forthwith.

Respectfully submitted,

/s/ Lisa B. Freeland

Lisa B. Freeland

Federal Public Defender

Counsel for Curtis Leroy Campbell